

DMB:DSS

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

**M10- 743**

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UNITED STATES OF AMERICA

-against-

WILLIE ZIMMERMAN,  
also known as "Brown,"

Defendant.

COMPLAINT AND AFFIDAVIT  
IN SUPPORT OF  
APPLICATION FOR  
ARREST WARRANT

(21 U.S.C. § 841)

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EASTERN DISTRICT OF NEW YORK, SS:

JAMES GLYNN, being duly sworn, deposes and states that he is a Special Agent with the Federal Bureau of Investigation ("FBI"), duly appointed according to law and acting as such.

Upon information and belief, on or about and between March 4, 2008 and September 10, 2009, within the Eastern District of New York, the defendant WILLIE ZIMMERMAN, also known as "Brown," did knowingly and intentionally distribute and possess with intent to distribute a controlled substance, which offense involved five or more grams of a substance containing cocaine base, a Schedule II controlled substance.

(Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(B)(iii)).

The source of your deponent's information and the grounds for his belief are as follows:<sup>1/</sup>

1. I have been a Special Agent with the FBI for approximately 20 years. I have extensive experience investigating street gangs, violent crimes, narcotics trafficking, and other violations of state and federal law. My information in this case comes from my own personal involvement in this investigation, as well as from interviews with cooperating sources, the review of records and reports produced by other law enforcement officers, and conversations with other law enforcement officers.

Background of the Investigation

2. For approximately two years, I have been involved in a joint investigation conducted by the FBI and the New York City Police Department pertaining to narcotics trafficking and violent crimes, including shootings and murders, that have occurred in the Bedford-Stuyvesant section of Brooklyn, New York. This investigation has previously led to the arrest and indictment of more than ten individuals for federal narcotics and firearms offenses.

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<sup>1/</sup> Because the purpose of this Complaint is to state only probable cause to arrest, I have not described all of the relevant facts and circumstances pertaining to this investigation of which I am aware.

3. During the course of this investigation, I have regularly employed cooperating sources to purchase narcotics and firearms from members of various drug trafficking "crews" operating in Bedford-Stuyvesant. As is set forth below, on five occasions between March 4, 2008 and September 10, 2009, two cooperating sources purchased quantities of cocaine base from the defendant WILLIE ZIMMERMAN, also known as "Brown."

Sales of Cocaine Base

4. On March 4, 2008, at approximately 3:45 p.m., cooperating source #1 ("CS #1")<sup>2/</sup> met the defendant WILLIE ZIMMERMAN inside 390 Gates Avenue in Brooklyn, New York. CS #1 discussed the purchase of a quantity of crack cocaine with ZIMMERMAN. ZIMMERMAN proceeded to sell CS #1 five "8-balls" of crack cocaine in exchange for \$600. This transaction was recorded on audio and videotape. The crack cocaine purchase by CS #1 from ZIMMERMAN on March 4, 2008 was subsequently tested by the Drug Enforcement Administration ("DEA") laboratory. The DEA laboratory determined that the substance contained cocaine base and had a net weight of 9.0 grams.

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<sup>2/</sup> At the time, CS #1 was a paid informant working for the FBI. CS #1 has provided reliable information to the FBI on numerous occasions, and has engaged in many controlled purchases of narcotics at the direction of the FBI. CS #1 is currently in New York state custody following a conviction for charges unrelated to the instant investigation.

5. On March 12, 2008 at approximately 2:00 p.m., CS #1 met ZIMMERMAN in the vicinity of Bedford Avenue and Gates Avenue in Brooklyn, New York. ZIMMERMAN proceeded to sell CS #1 three "8-balls" of crack cocaine in exchange for \$360. This transaction was recorded on audio and videotape. The narcotics purchased by CS #1 from ZIMMERMAN on March 12, 2008 was subsequently tested by the DEA laboratory and was determined to contain cocaine base, with a net weight of 5.3 grams.

6. On April 2, 2008, at approximately 12:45 p.m., CS #1 met ZIMMERMAN inside 390 Gates Avenue. ZIMMERMAN proceeded to sell CS #1 five "8-balls" of crack cocaine for \$600. The narcotics purchased by CS #1 from ZIMMERMAN on April 2, 2008 was subsequently tested by the DEA laboratory and was determined to contain cocaine base, with a net weight of 8.6 grams.

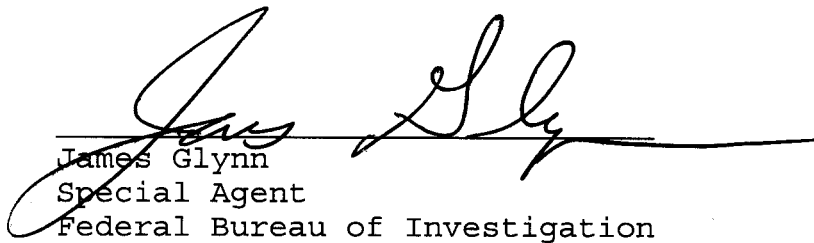
7. On June 19, 2008, at approximately 2:00 p.m., CS #1 met ZIMMERMAN inside 390 Gates Avenue. ZIMMERMAN and CS #1 discussed the sale of five "8-balls" of crack cocaine. ZIMMERMAN left CS #1 in the lobby, and then returned approximately ten minutes later. ZIMMERMAN proceeded to sell CS #1 five "8-balls" of crack cocaine for approximately \$600. This transaction was recorded on audio and videotape. The narcotics purchased by CS #1 from ZIMMERMAN on June 19, 2008 was subsequently tested by the DEA laboratory and was determined to contain cocaine base, with a net weight of 9.3 grams.

8. On September 10, 2009, at approximately 1:30 p.m., cooperating source #2 ("CS #2")<sup>3/</sup> met ZIMMERMAN in the vicinity of 390 Gates Avenue. CS #2 and ZIMMERMAN discussed the purchase of a quantity of crack cocaine. ZIMMERMAN then left CS #2, and returned a short time later. Thereafter, ZIMMERMAN proceeded to sell CS #2 one "8-ball" of crack cocaine in exchange for \$150. The narcotics purchased by CS #2 from ZIMMERMAN on September 10, 2009 was subsequently tested by the DEA laboratory and was determined to contain cocaine base, with a net weight of 3.1 grams.

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<sup>3/</sup> At the time, CS #2 was a paid informant working for the FBI. CS #2 has provided reliable information to the FBI on numerous occasions, and has engaged in multiple controlled purchases of narcotics at the direction of the FBI.

WHEREFORE, your deponent respectfully requests that an arrest warrant be issued and the defendant WILLIE ZIMMERMAN be dealt with according to law.

  
James Glynn  
Special Agent  
Federal Bureau of Investigation

Sworn to before me this  
29<sup>th</sup> Day of June, 2010

  
THE  
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M  
E JUDGE  
YORK